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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:)	BK-S 09-10362 BAM
)	
BRUCE E. GORDEN and)	Chapter 13
CORRINE K. GORDEN,)	
)	341 Hearing:
)	Date of Hearing: April 2, 2009
SS#S: 4041)	Time of Hearing: 8:30 a.m.
5903)	
Debtors.)	Confirmation Hearing:
)	Date of Hearing: April 2, 2009
)	Time of Hearing: 1:30 p.m.

**RESPONSE TO AMERICA'S SERVICING COMPANY'S
OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

Now come BRUCE E. GORDEN and CORRINE K. GORDEN, (hereinafter the "Debtors"), by the law firm of MARK SEGAL, CHARTERED, and attorney MARK SEGAL, ESQ., and respond to America's Servicing Company's (hereinafter "Movant") Objection to Confirmation of Chapter 13 Plan and submit as follows:

The objection to confirmation is not well grounded as it relies on an inadequate and erroneous proof of claim filed by America's Servicing Company. The objection must be denied as the proof of claim is deficient because it does not contain a Schedule "A" which would allegedly sets forth an explanation of the \$24,260.83 of arrearages claimed to be due pre-petition.

Claimant's recovery should be limited to the \$21,386.39 provided in Debtors' plan.

The original proof of claim filed with the Court does not contain a Schedule "A." This error is repeated in the Exhibit "A" attached to the objection to confirmation. On January 26, 2009, counsel for Debtors made a telephone request of counsel for America's Servicing Company to supply the missing Schedule "A." Claimant has failed to supply the schedule to its counsel who in turn has failed to supply it to Debtors' counsel. Debtors do not know why they would owe more

1 than the amount they have included in their plan and Claimant has failed to provide an explanation.

2 Based on the foregoing, Debtors submit the objection should be denied and their plan
3 confirmed.

4 DATED this 19th day of March, 2009.

5 Respectfully submitted,

6 MARK SEGAL, CHARTERED

7 By: 

8 MARK SEGAL, ESQ.

9 Nevada Bar No. 01963

720 S. Fourth Street, Ste. 301

Las Vegas, Nevada 89101

(702) 382-5212

10 Attorney for Debtors

CERTIFICATE OF SERVICE

I, Yvonne Simons, hereby certify that a true and correct copy of the above and foregoing RESPONSE TO AMERICA'S SERVICING COMPANY'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN was mailed this date by depositing a copy thereof, in a sealed envelope, first-class postage prepaid, in the United States Mail (or hand delivered, delivered by facsimile transmission, or delivered by overnight express mail, or by electronic notice), to the parties and addresses indicated as follows:

Gregory L. Wilde, Esq.
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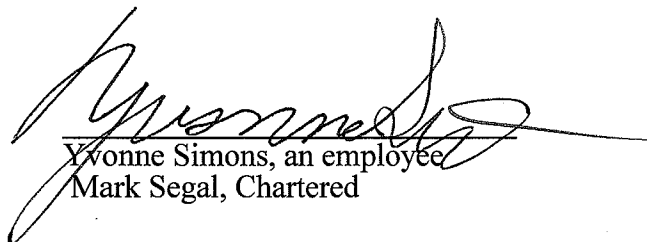
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U.S. Trustee
300 Las Vegas Blvd. South, #4300
Las Vegas, NV 89101

DATED this 19th day of March, 2009.


Yvonne Simons, an employee
Mark Segal, Chartered

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